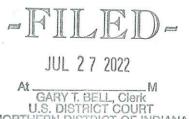
# USDC IN/ND case 1:22-cr-00043 HAB-SLO represent 1-2 filed 07/27/22 page 1 of 5

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA FORT WAYNE DIVISION



UNITED STATES OF AMERICA	)	INDICTMENT	
<b>v.</b>	)	Cause No. 1:22-CR-43	
	)	Violation:	
	)	18 U.S.C. §§ 922(A)(1)(a), 923(a)	
	)	and 924(a)(1)(D);	
DAMEAN D. BROWN	)	18 U.S.C. § 922(d)(1); and,	
	)	18 U.S.C. §§ 922(a)(6)	

## THE GRAND JURY CHARGES:

## COUNT 1

Beginning on or about May 8, 2021, and continuing through on or about May 22, 2022, in the Northern District of Indiana,

## DAMEAN D. BROWN,

defendant herein, not being a licensed dealer and manufacturer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing firearms;

All in violation of 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D).

#### THE GRAND JURY FURTHER CHARGES:

## **COUNTS 2 - 10**

Between on or about August 1, 2021, and continuing until on or about May 8, 2022, in the Northern District of Indiana,

#### DAMEAN D. BROWN,

defendant herein, did knowingly sell and otherwise dispose of a firearm to a person, knowing and having reasonable cause to believe that such person had been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, in the following manner:

COUNT 2, selling and disposing of a Taurus, model PT 24/7 Pro DS, to D.M.

COUNT 3, selling and disposing of a Taurus, model G3, to J.R.

COUNT 4, selling and disposing of a Smith & Wesson, model SD9 VE to J.R.

COUNT 5, selling and disposing of a Glock, model 19, to J.R.

COUNT 6, selling and disposing of a Taurus, model G3C, to J.R.

COUNT 7, selling and disposing of a Kel-Tec, model P17, to D.M.

COUNT 8, selling and disposing of a SAR USA, model SAR 9, to J.R.

COUNT 9, selling and disposing of a Smith & Wesson, model SD 40, to J.R.

COUNT 10, selling and disposing of a Glock, model 20, to J.R.

All in violation of 18 U.S.C. § 922(d)(1).

#### THE GRAND JURY FURTHER CHARGES:

#### COUNT 11

On or about September 14, 2021, in the Northern District of Indiana,
DAMEAN D. BROWN,

defendant herein, in connection with the acquisition and attempted acquisition of a firearm, namely a Kel-Tec, model P17 pistol, from Freedom Firearms, LLC, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious statement to Freedom Firearms, LLC, which statement was intended and likely to deceive Freedom Firearms, LLC, as to a fact material to the lawfulness of such sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he resided at 3705 McCormick Ave., Fort Wayne, and that he was the actual purchaser of the firearm, knowing that information to be false;

All in violation of 18 U.S.C. § 922(a)(6).

## THE GRAND JURY FURTHER CHARGES:

#### COUNT 12

On or about January 27, 2022, in the Northern District of Indiana,

#### DAMEAN D. BROWN,

defendant herein, in connection with the acquisition and attempted acquisition of a firearm, namely a Glock, model 23 pistol, from ZX Gun Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious statement to ZX Gun Inc., which statement was intended and likely to deceive ZX Gun Inc. as to a fact material to the lawfulness of such sale of the firearm to the defendant under Chapter 44 of Title 18, in that the defendant represented that he resided at 3705 McCormick Ave., Fort Wayne, and that he was the actual purchaser of the firearm, knowing that information to be false;

All in violation of 18 U.S.C. § 922(a)(6).

USDC IN/ND case 1:22-cr-00043-HAB-SLC document 1-2 filed 07/27/22 page 5 of 5

THE GRAND JURY FURTHER CHARGES:

COUNT 13

On or about March 16, 2022, in the Northern District of Indiana,

DAMEAN D. BROWN,

defendant herein, in connection with the acquisition and attempted acquisition

of a firearm, namely a Glock, model 20 pistol, from ZX Gun Inc., a licensed

dealer of firearms within the meaning of Chapter 44, Title 18, United States

Code, knowingly made a false and fictitious statement to ZX Gun Inc., which

statement was intended and likely to deceive ZX Gun Inc. as to a fact material

to the lawfulness of such sale of the firearm to the defendant under Chapter

44 of Title 18, in that the defendant represented that he resided at 3705

McCormick Ave., Fort Wayne, and that he was the actual purchaser of the

firearm, knowing that information to be false;

All in violation of 18 U.S.C. § 922(a)(6).

A TRUE BILL

/s/ Foreperson

Foreperson

CLIFFORD D. JOHNSON UNITED STATES ATTORNEY

/s/ Stacey R. Speith

By: Stacey R. Speith

Assistant United States Attorney